

RPF/kic: 05/08/20

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendant.

CIVIL ACTION NO. 3:17-01362

Honorable David A. Faber

CABELL COUNTY COMMISSION,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendant.

CIVIL ACTION NO. 3:17-01665

Honorable David A. Faber

DECLARATION OF SEAN HAMMERS

I, Sean Hammers, hereby affirm, under penalty of perjury, that I am over 18 years of age and am competent to make the following declaration.

1. I have personal knowledge of all facts stated herein and they are true and correct to the best of my knowledge and belief.

2. I am the Prosecuting Attorney for Cabell County, West Virginia and have served in that position since 2014. Prior to that, I served as Assistant Prosecuting Attorney for Cabell County, West Virginia from 1996 to 2014.

3. To the best of my knowledge and belief, no documents are responsive to Defendants' request for departmental and/or custodial files as ordered by Discovery Ruling, Dkt.

366 ("DR3"), which involve communications concerning official or unofficial policies specifically regarding the Opioid Crisis. To the best of my knowledge and belief, the Cabell County Prosecutor's Office did not have an official or unofficial policy specifically regarding the Opioid Crisis. The Cabell County Prosecutor's Office prosecutes crimes based upon the individual facts and law of each case.

4. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED on this 12th day of May, 2020.



SEAN HAMMERS